

## WASTE MANAGEMENT PLAN REVIEW CQI STUDY

Attachment VII

### PURPOSE

A continuous quality improvement (CQI) study is necessary to determine the following: (1) what can be done to further streamline and improve plan review, (2) how plan review vacancies should be filled within the Waste Management Program after 1998, (3) what barriers may exist with the decentralization of plan review staff (or centralized/decentralized staff) and how best to address those barriers with our customers, and (4) what systems and materials are needed to provide all plan review staff within the Program opportunities to stay current with the "state of the art" and to ensure consistent reviews are performed statewide.

Waste Management Plan Review History: Since the purpose of plan review is first and foremost to prevent pollution, the level of plan review necessarily depends on the potential a project has to impact the public's health, welfare, and the environment. The Waste Management Program has stressed detailed plan review as a means of ensuring waste management facilities are designed and constructed properly since the early 1970's. Follow-up inspections have been used for documenting construction and monitoring operations. More recently due to increased workloads and ever more limited resources, the Program is beginning to shift its emphasis from detailed plan review toward more construction oversight, plan implementation inspections and performance audits to help prevent pollution. Extensive construction documentation requirements have proved invaluable in diagnosing and correcting problems which have developed at several of Wisconsin's engineered landfills, but some obvious problems could have been prevented by more construction oversight, or at least may have been detected earlier, if detailed plan implementation inspections and performance audits had been conducted on a regular basis. A solid waste subteam is currently charged with developing an environmental audit process for landfills which will assist in addressing this issue.

Potential to Further Streamline and Improve Plan Review: Plan review activities for non-landfill projects that have a lesser chance to cause significant impacts have already been targeted for substantial reduction by the Program. A solid waste subteam is currently charged with developing plan review packets containing information and forms to be used by applicants and staff to improve the level of information received by the department for such facilities and for staff to potentially be able to approve or deny such projects after a brief meeting with the applicant and a field inspection to ensure location criteria are met.

The waste management codes (NR 500 and 600 series) have just recently been updated and somewhat streamlined to allow for more efficient and effective plan review and greater customer satisfaction. Additional streamlining would likely entail the need for statutory changes. Examination of the statutes needs to be completed to identify and recommend which statutes may need to be changed to allow for additional streamlining to occur. Also, any expedited measures need

to be examined to ensure they can be successfully implemented without creating compromising environmental quality or significant controversy. Historically, plan review staff have spent much of their time helping applicants design their projects to make them acceptable for approval. This certainly can be perceived as necessary to provide customer service and to facilitate public and private partnerships, but experience shows that it can also encourage consultants to submit trial balloon designs and incomplete reports. Even more important, it has misled the general public and some applicants into believing the department is responsible for a facility if it causes environmental damage in the future because as they see it, the department helped design it, approved it and licensed it. This existing situation needs to be addressed and recommendations made on whether staff should be directed to limit the time they spend on such activities.

The Waste Management Program's approval formats are lengthy and conditions of approval or denial are constantly having to be re-developed by staff. The solid waste subteam working on developing a landfill audit process is planning to provide wording for routine conditions of approval, but site-specifics will always likely demand a few unique conditions. Approval letters for all types of waste management facilities need to be examined and ways to shorten their length without compromising their legality need to be identified. For instance, if detailed project descriptions are found to not be absolutely necessary, such descriptions could be eliminated or at least substantially reduced.

Duplication of plan review oversight should be eliminated wherever possible. To help accomplish this, lines of authority and work responsibilities need to be more clearly defined and full review and approval responsibility given to whoever has the lead for a project. If successfully and legally implemented, the time savings could be tremendous and it would allow staff to better serve both their internal and external customers.

On the other hand, larger and more highly complex waste management facilities are now being built and limited plan reviews may allow geological information that has been incorrectly interpreted or flawed design details to be missed. Therefore, it is imperative that the CQI study ensure that decision integrity and environmental protection is not compromised due to cursory reviews, hasty approvals, or inadequate site investigations/designs. For landfill siting in particular, a detailed plan review may always be necessary for documenting why and under what conditions the proposed facility should be approved by the Department. Problems and deficiencies should be identified up front before they develop into major hurdles to an approval or damage to the environment. The general public also expects the Department to perform plan reviews that result in protection of the environment. An increased public perception problem with waste management facilities and the waste management industry may occur if what's perceived as "cursory" reviews occur. Poor siting decisions or mistakes made in the design of a waste management facility may take decades to result in failed performance. It is so much more difficult to judge the performance of a waste management facility, especially a landfill, during the first, say, 10 years. The challenge to the CQI group is to provide for an effective plan review process that minimizes the risk to the environment.

Filling Plan Review Vacancies After 1998: Until recently, most waste management plan review was performed by a centralized group of professionals who over time were able to collectively draw on a great depth of experience. Under the department's current organizational commitment to decentralization to provide easier access to staff for its customers and to have decisions made closer to it's customers, almost all plan review is now being provided by staff assigned to the five regions located throughout the state. In the past, it was always thought that to help ensure consistency and to maintain an equal footing with their customers, a critical mass of professional plan reviewers needed to be maintained in a central location where they could frequently interact "face to face" with each other and their supervisors. A test of the decision to decentralize plan review has not really occurred since the majority of the staff assigned to plan review remain housed close together in the central office. To evaluate whether future vacancies should be located in the regions, the workload and performance of those staff and new staff recently hired to fill vacancies located in the field offices will need to be examined as part of the CQI study. The effect, if any, the relocation and dispersion of the plan review expertise pool has had on plan review needs to be measured in order to make recommendations on where staff should be located in the future and why. Regional staff currently located in the central office also need to be surveyed to identify what they believe to be the benefits or deficiencies of being located in the central office. As part of this effort, an evaluation of the barriers to customer service, if any, of the location of plan review staff needs to be examined. None of the staff who have physically relocated will be moved again. Consequently, the results of the CQI study of ideal location may not be implemented for some time. The barriers that this presents, as will a recommendation in overcoming those, should be examined as part of this CQI study.

Systems and Materials Needed to Help Staff Stay Current and to Ensure Consistency: It takes a number of years for staff to gain the necessary expertise to perform detailed plan reviews in the waste management program, to recognize design flaws and to learn existing methods and all of the history behind previous decisions. Comprehensive training needs to be provided to all new staff and to even experienced staff for review. Materials and documents readily available in the central office need to be made available to all regional offices. A solid waste subteam is charged with identifying, developing, and providing training to plan review staff and has provided a comprehensive manual on plan review procedures and initial training sessions on its use. The program also has officially adopted a plan review mentor system, but many of the more experienced plan review staff are still located in the central office. This is an issue that the internal members of the CQI committee would primarily address.